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CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

14 CHI NGUYEN,
15 Plaintiff,
16 vs.
17 CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC., *et al.*,
18 Defendants.

CASE NO.: 3-11-CV-00756-MMC
**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE DISCOVERY AND MOTION
DEADLINES BY 30 DAYS; ORDER THEREON**
Motion To Be Decided on Papers
DEPT: Courtroom 7, 19th Floor
JUDGE: Hon. Maxine M. Chesney
ACTION FILED: February 18, 2011
TRIAL DATE: None

21 IT IS HEREBY STIPULATED AND AGREED by and among all parties that:

22 All deadlines related to disclosure of rebuttal expert witnesses and reports and motions related
thereto shall be vacated and continued by 30 days.

24 A continuance of said deadlines is necessary because the second day of Plaintiff's deposition, the
25 second day of Defendant's Human Resources Director's deposition are not yet complete. Additionally,
26 Defendant's retained human resources expert was called out of town, and has requested additional time
27 to review Plaintiff's expert's 68-page report and provide a comprehensive response.

1 IT IS SO STIPULATED AND AGREED.
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4 DATED: October 23, 2012
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/s/
7 Michael R. Bracamontes, Esq.
8 Bracamontes & Vlasak, P.C.
9 Attorney for Plaintiff

10 DATED: October 23, 2012
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/s/
Cortney L. McDevitt, Esq.
Jackson Lewis, LLP
Attorney for Defendant

13 IT IS SO ORDERED that the deadlines concerning rebuttal experts only are vacated and reset as
14 follows:
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- 16 1. The parties' deadline to disclose rebuttal expert witnesses shall be November 26, 2012.
2. The parties' deadline to file a Motion to Exclude Rebuttal Expert Witnesses shall be November
30, 2012.
3. The last day for a hearing on a party's Motion to Exclude a Rebuttal Expert Witness shall be
~~January 3, 2013~~. January 4, 2013.

17 Dated: October 26, 2012


Honorable Maxine M. Chesney
Judge of the U.S. District Court

26 4823-4853-8385, v. 1
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